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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ANDREW KALLAS,

Plaintiff,

vs.

WHITE HAWKS AUTO LLC, a California limited  
liability company, TEMPUS LOGIX, INC., a  
California corporation, NORTHLAND  
INSURANCE COMPANY, a Connecticut  
corporation, LUBERNER INTERNATIONAL  
INSURANCE AGENCY, INC., and DOES 1-15

Defendants.

Case No. 2:24-cv-02385-CDS-MDC

AMENDED DISCOVERY PLAN AND  
SCHEDULING ORDER  
SPECIAL SCHEDULING REVIEW  
REQUESTED

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule of Practice 26-1(e), the parties, by and through their counsel of record, hereby submit their proposed Discovery Plan and 25 Scheduling Order.

1. Meeting. On January 21, 2025, the parties, through their respective counsel, Bradley Paul Elley, Esq. on behalf of Plaintiff, Bruce Scott Dickinson on behalf of Defendant WHITE HAWKS AUTO LLC, Timothy Hunter on behalf of Defendant NORTHLAND INSURANCE COMPANY, Luz Mejia on behalf of Defendant LUBERNER INTERNATIONAL

1 INSURANCE AGENCY, INC., met and conferred. Defendant TEMPUS LOGIX has not  
2 appeared in this action and its default has been entered by the Clerk of this Court.

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4  
5 **2. Discovery Plan.**

- 6 a. Per LR 26-6 (b) (6), in the event the matter has not been settled by all of the  
7 appearing parties, the appearing parties will make their initial disclosures not  
8 later than February 25, 2025. This initial disclosures deadline and the filing of  
9 this Discovery Plan are deviations from the standard disclosures and discovery  
10 plan filing deadlines due to the ongoing efforts to settle this matter at this early  
11 stage. The filing of this Discovery Plan had been extended to February 11, 2025,  
12 by that certain order allowing same filed this date.  
13  
14 b. The subjects on which discovery is needed are all aspects of liability and  
15 damages, including discovery as to all claims and defenses within the scope of  
16 the pleadings.  
17  
18 c. In addition to production of physical documents, disclosures may be made  
19 electronically and through CD and DVD production.  
20  
21 d. Any documents for which a privilege is claimed shall be identified in a  
22 privilege log with a description of the type of document claimed to be  
23 privileged, the date of the document and the basis for the claim of privilege.  
24  
25 e. There will be no limitations on discovery beyond those specified in the  
26 Federal Rules of Civil Procedure and Local Rules of Practice.  
27  
28 f. The following dates shall govern:

1. The discovery cutoff shall be July 18, 2025, which is 178 days from the initial appearance of the defendants by answering or otherwise, by their execution and filing of the Joint Status Report on January 21, 2025.
  2. The deadline for filing motions to amend the pleadings or to add parties shall be April 18, 2025, which is 91 days prior to the close of discovery.
  3. The deadline for making initial expert disclosures shall be May 19, 2025, which is 60 days prior to the close of discovery.
  4. The deadline for making rebuttal expert disclosures shall be June 18, 2025, which is 30 days after the deadline for initial expert disclosures.
  5. The deadline for filing dispositive motions shall be August 15, 2025, which is 28 days after the discovery cutoff date.
  6. The parties shall file a Joint Pretrial Order no later than September 12, 2025, which is 28 days after the deadline for filing dispositive motions. In the event that dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until 30 days after a decision on the dispositive motions unless otherwise ordered by the court.
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3. Per LR 26-6 (b) (7), the parties certify that that they met and conferred about the possibility of using alternative dispute-resolution processes, including mediation, arbitration, and if applicable, early neutral evaluation.
  4. Per LR 26-6 (b) (8), the parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General) Order 2013-01.



**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that I am an employee of the office of Bradley Paul Elley, Esq. and that, on this date, a true and correct copy of AMENDED DISCOVERY PLAN AND SCHEDULING ORDER DISCOVERY PLAN AND SCHEDULING ORDER SPECIAL SCHEDULING REVIEW REQUESTED was served via the United States District Court CM/ECF system and a copy was sent by electronic notice to the following:

Bruce Scott Dickinson, Esq.  
Aileen E. Cohen, Esq.  
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Pro Hac Vice Attorneys for Northland Insurance Company

I further certify I caused to be deposited in the United States mail, at Incline Village, Nevada, a true and correct copy of AMENDED DISCOVERY PLAN AND SCHEDULING ORDER DISCOVERY PLAN AND SCHEDULING ORDER SPECIAL SCHEDULING REVIEW REQUESTED by placing the same in a sealed envelope upon which First Class

Luz Mejia  
Luberner International Ins. Agency Inc.  
13303 S. Inglewood Ave.  
Hawthorne, CA 90250

DATED: February 24, 2025.

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